STATE OF NORTH CAROLINA

COUNTY OF HARNETT

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
CASE NO. 13 CVS 873

CONNIE B. MCLEOD and CYNTHIA L. DAVIS-MCLEOD,

Plaintiffs,

v.

SAFEGUARD PROPERTIES, LLC, U.S. BEST REPAIR SERVICE, INC., and BANK OF AMERICA, N.A.,

Defendants.

STATEMENT OF MONETARY RELIEF SOUGHT

NOW COME Plaintiffs Connie B. McLeod and Cynthia L. Davis-McLeod (hereinafter "Plaintiffs"), by and through their undersigned counsel, hereby responding to the Request for Monetary Relief Sought by Defendant Safeguard Properties, LLC (hereinafter "Defendant"). Plaintiff requests monetary relief in an amount to be calculated as the sum of the following:

(1) Compensation for replacement cost of personal property stolen or otherwise taken from Plaintiffs' home by Defendant, or its agents, reasonably calculated as $4,500.69;

(2) Compensation for mental and emotional pain and suffering caused by, among other things, the multiple trespasses of Defendant, or its agents, into their home – such amount to be determined by a jury in its sole discretion in a manner which is just and fair;

(3) Statutory penalties and fees pursuant to N.C. Gen. Stat. § 75-1.1; and

(4) Punitive damages in an amount to be determined by a jury in its sole discretion based upon, among other things, the factors set forth in N.C. Gen. Stat. § 1D-35.

EXHIBIT
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By way of further response, Plaintiffs state that investigation and discovery in this matter is ongoing, and they reserve the right to amend this Statement of Monetary Relief Sought.

Respectfully submitted, this the 8th day of November, 2013.

MAGINNIS LAW, PLLC
Counsel for Plaintiffs

BY: ______________________
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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **STATEMENT OF MONETARY RELIEF SOUGHT** to be served upon the following by first class mail, postage prepaid:

Bailey & Dixon, L.L.P.
Mr. J.T. Crook
Post Office Box 1351
Raleigh, North Carolina 27602
Counsel for Defendant Safeguard Properties, LLC

This the 8th day of November, 2013.

T. Shawn Howard